

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

In re:

Case No.: 20-10322 CLB

The Diocese of Buffalo, N.Y.,

Chapter 11

Debtor.

EX PARTE APPLICATION TO APPEAR PRO HAC VICE

John O'Connor ("Applicant") of Steptoe & Johnson, LLP, hereby files this application for entry of an order, substantially in the form attached hereto as **Exhibit "A"**, granting admission *pro hac vice* for the purpose of appearing as counsel on behalf of Zurich American Insurance Company, and to participate in any and all proceeding relative to the above-captioned case only. In support of this Application, the Applicant respectfully represents as follows:

1. The Applicant is not currently under suspension or subject to other disciplinary action with respect to the practice of law, and is a member in good standing of the Bar of the District of Columbia, among others.

2. In further support of the Application, Applicant submits the *Declaration of Attorney John O'Connor in Support of Ex Parte Application to Appear Pro Hac Vice*, attached hereto as **Exhibit "B"**.

WHEREFORE, The Applicant requests this Court enter an order of admission *pro hac vice* for purposes of this case only.

Dated: July 20, 2021

Respectfully submitted,

/s/ John O'Connor

John O'Connor
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
P: (202) 429-8095
joconnor@steptoe.com

*Counsel for Zurich American
Insurance Company*

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

In re:

Case No.: 20-10322 CLB

The Diocese of Buffalo, N.Y.,

Chapter 11

Debtor.

ORDER GRANTING *EX PARTE* APPLICATION TO APPEAR *PRO HAC VICE*

Upon the *Ex Parte Application to Appear Pro Hac Vice*, submitted by John O'Connor, for the purposes of appearing as counsel on behalf of Zurich American Insurance Company, and to participate in any and all proceedings relative to the above-captioned case, and upon the *Declaration of Attorney John O'Connor in Support of Ex Parte Application to Appear Pro Hac Vice*, and upon the applicant's certification that the applicant is a member in good standing of the bar of the District of Columbia, it is hereby:

ORDERED, that John O'Connor may appear before this Court *pro hac vice* for the purpose of appearing as counsel on behalf of Zurich American Insurance Company, and to participate in any and all proceedings relative to the above-captioned case.

Dated: July __, 2021
Buffalo, New York

Hon. Carl L. Bucki, U.S.B.J.

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

In re:

Case No.: 20-10322 CLB

The Diocese of Buffalo, N.Y.,

Chapter 11

Debtor.

**DECLARATION OF ATTORNEY JOHN O’CONNOR IN SUPPORT
OF EX PARTE APPLICATION TO APPEAR PRO HAC VICE**

I, John O’Connor, state that:

1. I am a partner with the law firm of Steptoe & Johnson LLP, with offices at 1330 Connecticut Ave. NW, Washington, D.C. 20036.

2. I submit this Declaration in support of the *Ex Parte Application to Appear Pro Hac Vice* for the purpose of appearing as counsel on behalf of Zurich American Insurance Company, and to participate in any and all proceedings relative to the above-captioned case.

3. The courts in which I am admitted to practice and the dates of admission are as follows:

Courts	Date of Admission
District of Columbia Court of Appeals	11/6/1998
Maryland Court of Appeals	1/3/1996
Virginia Supreme Court	4/24/2018
U.S. Court of Appeals for the Second Circuit	7/1/2021
U.S. Court of Appeals for the Third Circuit	10/25/2007
U.S. Court of Appeals for the Fourth Circuit	6/13/2005
U.S. Court of Appeals for the Fifth Circuit	9/27/2019
U.S. Court of Appeals for the Ninth Circuit	12/27/2001
U.S. Court of Appeals for the Tenth Circuit	4/20/2010
U.S. Court of Appeals for the District of Columbia Circuit	2/29/2008
U.S. Court of Appeals for the Armed Forces	1/6/2012
U.S. Supreme Court	11/25/2012
U.S. District Court for the District of Columbia	1/10/2000
U.S. District Court for the District of Maryland	11/16/1998

U.S. District Court for the Eastern District of Virginia	5/4/2018
U.S. Court of Federal Claims	8/28/2003

4. I am a member in good standing of the Bar of the District of Columbia, as evidence by the Certificate of Good Standing annexed hereto as Exhibit 1.

5. I acknowledge that I shall be subject to the jurisdiction of the United States Bankruptcy Court for the Western District of New York with respect to any acts occurring during the course of my participation in this manner.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of July, 2021, Washington,
DC.

/s/ John O'Connor
John O'Connor

EXHIBIT 1



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

John F O'Connor, Jr.

was duly qualified and admitted on November 6, 1998 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, a(n)
ACTIVE member in good standing of this Bar.

**In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on June 24,
2021.**

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

Issued By: 
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.